COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BERKSHIRE GAS COMPANY	**D.T.E. 01-56**

ATTORNEY GENERAL'S THIRTEENTH SET OF
DOCUMENT AND INFORMATION REQUESTS

The following is the Attorney General's THIRTEENTH SET of Information Requests in the above referenced docket to be answered according to the instruction already issued by the Attorney General

AG-13-1 Please provide a table listing all Cost of Service Study Allocators and showing where the development and supporting documentation is provided in the Company's filing. For internally developed allocators, please provide a listing of all components of the allocator and the location of the data within the model (page and account number). For externally developed allocators, please provide all workpapers, calculations, assumptions and supporting materials and documentation not provided in the Company's filing.

AG-13-2 How does the Company currently account for each of the following revenue sources:

Special Contract sales;
Interruptible Sales;
Interruptible Transportation;
Capacity Release;
Off System Sales;
Sales for Resale; and
Other non-tariffed gas sales (specify the different types).

The response should provide the account numbers to which the revenue is booked and how the revenue flows through to the benefit of other customers–if there is margin sharing; describe the basis for computing the margin and the amount shared.

AG-13-3 Please provide for the following revenue sources the test year and the four prior years (1996-2000) volumes sold, revenues and amount of any benefit shared with other customers and the date the benefit was passed through to the customers:

Special Contract sales;
Interruptible Sales;
Interruptible Transportation;
Capacity Release;
Off System Sales;
Sales for Resale; and
Other non-tariffed gas sales (specify the different types).

AG-13-4 Refer to the Company's response to AG-2-3. How is the Company proposing to allocate each of the costs shown in AG-2-3 to the two CGA classes, High Load Factor and Low Load Factor? If this Cost of Service Study is not the basis for the CGA cost allocations, please explain in detail the differences in the allocation methods and explain why the Company did not replicate the proposed CGA allocation methodology.

AG-13-5 Refer to the Company's response to AG-8-2. Please confirm that the "PERCLAIM" allocator is the same as the "REVCLAIM" allocator.

AG-13-6 Please provide a copy of the fully allocated accounting cost of service study filed as part of the compliance filing in the Company's base rate case, DPU 92-210. If no cost of service study was included in the compliance filing, please provide the study the Company relied on for rate design purposes. If the Company updated the cost study to incorporate the findings of initial order in DPU 92-210 and the subsequent recalculation/reconsideration order's findings, please provide a copy of that cost of service study.

AG-13-7 Please provide a listing of all allocators used in the 1992 (DPU 92-210) accounting cost of service study that are not used in the cost of service study submitted in this case. Please explain, in detail why each different allocator was chosen for use in this filing.

AG-13-8 Refer to the Company's response to AG-9-5 (CONFIDENTIAL). The Company indicates that there are several potential firm customers. Please provide an estimate of the annual volumes and demand bill determinants associated with each of these potential firm customers. Include an estimate of annual revenue associated with the estimate for each customer and provide all assumptions and calculations supporting this response.

AG-13-9 Please provide bill impact analyses for each of the Company's Quasi Firm rate classes, including Q/T-54. Include a typical bill impact for each class. Provide all workpapers, calculations and assumptions.

AG-13-10 Refer to the Company's supplemental response to AG-9-1. The response indicates that the model provided was not fully functional. If the Company were required to redo its cost of service study incorporating specific changes to input values, how would the Company respond? Would a new model have to be developed?

AG-13-11 Refer to the Company's supplemental response to AG-9-1(another "model was provided by e-mail). Please provide explicit and detailed instructions as to how the model may be run with different allocators used in the place of DISTR, DEMLNG, DEMLPG, DEMGAS, and EGASCOST.

AG-13-12 Refer to the Company's response to AG-9-5 (CONFIDENTIAL). The revenues provided are titled "Firm Test Year Base Revenues." Please provide the details of any other test year revenues for each of these customers.

AG-13-13 Refer to the Company's responses to AG-8-4 and AG-8-6. Is the Company seeking Department approval to share Alliance savings with shareholders? If yes, how does the Company propose to share the costs and losses associated with the Alliance with the shareholders?

AG-13-14 Refer to the Company's response to DTE-1-64. Please modify this response to break out the Quasi Firm, including T-54, IS and IT customers.

AG-13-15 Refer to the Company's response to DTE-1-65. Please explain how the Company proposes to treat weather insurance revenues for ratemaking purposes.

AG-13-16 Refer to the Company's response to DTE-1-65. Please provide the amount of weather insurance revenue are related to calendar 2000. Include the workpapers, calculations and assumptions supporting the response.

AG-13-17 Refer to DOER-1-18, Sched. B and AG-2-3. Please reconcile the $23,967,171, "Gas Costs per Cost of Service Study" with the $25,439,468 in the "CGA Cost of Service Study."

AG-13-18 Refer to DOER-1-6 and AG-9-2. Does the Company propose that it be granted complete discretion to increase some rates and decrease others to the extent that the net revenue affect does not exceed the revenue level allowed under the price cap formula; as long as no individual rate component/element increase exceeds the rate of inflation and no class's rate revenue is in excess of its allocated costs? Is this the extent of the rate design discretion the Company is seeking? If not, please explain what other rate design freedoms the Company contemplates.

AG-13-19 Refer to DOER-1-7. Does the Company intend to update its Cost of Service Study annually and file it as part of its annual Price Cap filing?

AG-13-20 Refer to AG-2-5. Please provide copies of the currently effective tariffs that the Company proposes to cancel.

AG-13-21 Refer to AG-2-5. Please explain how the Company accounts for Peaking Service revenues. What was the test year peaking service revenue? What is the basis for the peaking service rate change proposed in M..D.T.E.300? What is the current peaking service demand charge? How was the demand charge determined?

AG-13-22 Refer to AG-2-5, Interruptible Transportation Tariff. What is the basis for the proposed change to the floor price for customers with alternate fuel capabilities? Include all supporting workpapers, calculations and assumptions. Explain all other proposed changes to the Company's Interruptible Transportation tariff. Include the rationale for the elimination of the standard contract requirement.

AG-13-23 Refer to AG-2-5, T-54 Tariff.

A. Please explain why customers served under this tariff are exempted from any conservation/ECS charges.

B. How will the Company determine a T-54 customer's MDQ?

C. What is the basis for changing from a specific calculation of a MDTV to a non-specified calculation of a MDQ?

D. Why is the Company proposing to eliminate the standard contract requirement?

AG-13-24 Refer to AG-2-5. Please provide the basis for the proposed increase to the stand by generator rate. Include all workpapers, calculations, assumptions and supporting materials. What was the test year revenue from stand by generator rates? How is this revenue accounted for in the Company's cost of service study?

AG-13-25 How has the Company accounted for the Gas Light class in the Company's allocated cost of service study (costs and revenue)? What were the test year revenues for the Gas Light class? How many Gas Light customers were there during the test year?

AG-13-26 Refer to AG-2-5. Why did the Company add the exclusion in the availability clause of the residential tariffs? Does this language serve to exclude school dormitories? Will this change affect any existing residential customers? If yes, please quantify the affect–provide the number of customers by class and provide bill impact analyses.

AG-13-27 Refer to AG-2-5, Cost of Gas Adjustment Clause.
Please explain how the Company proposes to calculate bad debt expense for the CGAC.

Include a specific illustration in the response incorporating the formula on page 20 of MDTE No. 303.
How does this method differ from how the Company currently calculates its CGAC bad debt allowance.
How does the Company propose to reconcile the CGAC bad debt allowance?

AG-13-28 Refer to AG-2-5. Is it the Company's proposal to continue to include as costs for non-core customers in the base rates? What transactions are considered to be non-core? Please provide the Company's test year non-core revenues, gas costs and where in the Company's cost of service study it accounts for non-core revenues and costs.

AG-13-29 Refer to AG-2-5. Please provide a copy of the Department's order approving the Company's inventory financing cost recovery mechanism.

AG-13-30 Refer to AG-2-5. Please explain the rationale for the Seasonal Gas Cost Correction factor. How often is it determined?

AG-13-31 Refer to AG-2-5, MDTE No. 303, page 14. Please define the "Rs" term appearing in the COG Summer formula. If this is meant to be a reconciliation factor, shouldn't there be a Winter reconciliation factor? Please explain how the reconciliation adjustment is reflected in each season's CGA.

AG-13-32 Refer to AG-2-5, MDTE Mo. 303, p. 29. Please explain why the Company proposes to eliminate the provision crediting revenues received for "gas supply services other than Default Service" to the total allowable gas costs prior to the calculation of the GAS.

AG-13-33 Please explain how the Company proposes to allocate the savings from the BP Alliance to the individual customer classes (HLF and LLF). Include an illustration of how this allocation would be effected.

AG-13-34 Please provide for each interruptible/load management customer (G-80) the following data for each of the five years 1996 through 2000:

Billed volumes under the Load Management tariff,
Billed volumes for each Winter under the firm service tariff,
Payments made to customer under the Load Management tariff, show separately the demand and energy payments,
Failure to interrupt penalties,
Revenues received from the customer under the firm service tariff,
Periods of interruption, and

Duration of each interruption in hours,

AG-13-35 Refer to Schedule KMZ-5. Please explain in detail the purpose of the "correction factor." Include a discussion of how this type of factor was implemented in other MBA based CGAs (Bay State, Essex and Fitchburg) or if it was not, explain why.

September 28, 2001